

REMARKS

Claims 16 through 18 have been amended to obviate the rejections under 35 U.S.C. 112, second paragraph.

The Examiner rejected independent Claims 12 and 29 as being anticipated by either the German '085 reference or the German '848 reference. These rejections are respectfully traversed.

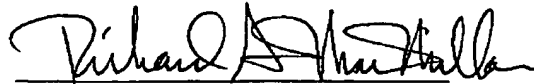
In both of independent Claims 12 and 29, the invention is defined as including structure for accommodating first and second dies. In independent Claim 12, "a first die [is] supported on the first platen and the second platen; [and] a second die [is] supported on the second platen and the base". In independent Claim 29, "a base platen [is] adapted to support a first section of a first die thereon; a ram platen [is] adapted to support a first section of a second die thereon, .... [and] an intermediate platen [is] located between said base platen and said ram platen and [is] adapted to support a second section of the first die and a second section of the second die thereon". The specification clearly defines each of the hydroforming dies 14 and 16 as being composed of a pair of cooperating die sections 18, 20 and 22, 24.

The German '085 reference appears to be completely irrelevant to the claimed invention because it includes only a single die, which is composed of an upper die section 14 and a lower die section 7. Thus, the rejections based upon the German '085 reference are clearly deficient and must be withdrawn.

The German '848 reference appears to show first and second die sections 61, 6b and 7a, 7b, but fails to show other specifically claimed features of the invention. Specifically, the German '848 reference does not show or suggest the structure recited in independent Claim 12, wherein the pin is secured to the first platen that, in turn, is secured to the ram. Also, the German '848 reference does not show or suggest the structure set forth in independent Claim 29, wherein a structure extends between the intermediate platen and one of the base platen and the ram platen to move the intermediate platen to the opened positions relative to the base platen and the ram platen when the ram platen is moved to the opened position (the manner of operation of the German '848 reference is not currently known - however a translation of that

reference is being obtained and will be filed when received). Finally, the German '848 reference does not show or suggest the structure recited in most of the other claims pending in the application, as noted by the Examiner. Thus, reconsideration of the final rejection of such claims is respectfully requested.

Respectfully submitted,



Richard S. MacMillan  
Reg. No. 30,085

MacMillan, Sobanski & Todd, LLC  
One Maritime Plaza, Fourth Floor  
720 Water Street  
Toledo, Ohio 43604  
(419) 255-5900